

# BRACEWELL

August 2, 2022

**BY ECF**

Hon. Analisa Torres  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *In re: Search Warrants dated November 3 and 5, 2021,*  
Nos. 21 Misc. 813, 21 Misc. 819 and 21 Misc. 825 (AT)

Dear Judge Torres:

Pursuant to the Court's Order, dated February 18, 2022 ("Order"), I am submitting for the Court's review the June 2022 invoice setting forth the fees, expenses, and costs incurred by me and my firm in connection with my role as Special Master in the above-referenced matters.

I have shared this invoice with the parties prior to submittal and provided them an opportunity to object or ask questions. No objections were received. Accordingly, I respectfully request that the Court approve this invoice and direct the parties to pay the amount set forth therein in accordance with the Order.

As always, I am happy to answer any questions the Court may have or provide additional information if necessary.

Respectfully submitted,

/s/ Barbara S. Jones

Barbara S. Jones

Attachment

cc: Counsel for all parties

**Barbara S. Jones**  
Partner

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## BRACEWELL

United States District Court, Southern District of New York (Veritas)  
 500 Pearl Street  
 New York, NY 10007

July 11, 2022  
 Invoice: 21937658

Our Matter: Special Master in Matters of Search Warrants regarding  
 Project Veritas  
 For Services Through June 30, 2022

| <u>Date</u> | <u>Description</u>  | <u>Hours</u> | <u>Amount</u> |
|-------------|---|--------------|---------------|
| 06/01/22    | Conf with J. Jones; review of materials   | 1.00         | 950.00        |
| 06/01/22    | Discuss next steps  | 0.50         | 475.00        |
| 06/01/22    | Draft materials for Judge Jones; discussion with Judge Jones re: same.                  | 2.30         | 2,070.00      |
| 06/01/22    | Discuss matter with Special Master; attention to technical issues; call with R Sobelman | 2.50         | 2,375.00      |
| 06/06/22    | Confer with team  | 0.50         | 475.00        |
| 06/06/22    | Research for R&R.   | 0.90         | 810.00        |
| 06/06/22    | Attention to issues related to objections   | 2.70         | 2,565.00      |
| 06/07/22    | Review submissions; research for R&R; draft R&R.  | 4.20         | 3,780.00      |
| 06/07/22    | Conference with R Maxwell; attention to review and technical issues                     | 1.80         | 1,710.00      |
| 06/08/22    | Review of materials; conf with J. Jones re decision                                     | 1.60         | 1,520.00      |
| 06/08/22    | Review progress/issues with R. Maxwell.   | 0.50         | 475.00        |
| 06/08/22    | Research and draft R&R; discussion with Judge Jones re: same.                           | 1.60         | 1,440.00      |
| 06/08/22    | Attention to review and technical issues re 1B45  | 3.20         | 3,040.00      |
| 06/09/22    | Research & draft R&R.   | 1.80         | 1,620.00      |

## BRACEWELL

Page 2

Client: United States District Court, Southern District of New York (Veritas)

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| <u>Date</u> | <u>Description</u>  | <u>Hours</u> | <u>Amount</u> |
|-------------|---|--------------|---------------|
| 06/09/22    | Attention to review and technical issues re 1B45  | 3.80         | 3,610.00      |
| 06/10/22    | Finalize release of 1B45  | 1.00         | 950.00        |
| 06/13/22    | Catch-up with R. Maxwell.   | 0.50         | 475.00        |
| 06/13/22    | Review materials and draft R&R.   | 2.70         | 2,430.00      |
| 06/13/22    | Attention to various re: review, releases, and objections                               | 1.40         | 1,330.00      |
| 06/14/22    | Review documents.   | 1.50         | 1,425.00      |
| 06/14/22    | Review materials and draft R&R.   | 4.70         | 4,230.00      |
| 06/14/22    | Review objections re responsiveness etc.  | 3.20         | 3,040.00      |
| 06/15/22    | Review materials and draft R&R.   | 3.30         | 2,970.00      |
| 06/15/22    | Attention to review and objections  | 2.80         | 2,660.00      |
| 06/16/22    | Discuss First Amendment issue with Rita Maxwell.  | 0.50         | 475.00        |
| 06/16/22    | Discussion with Judge Jones re: R&R.  | 0.30         | 270.00        |
| 06/19/22    | Research regarding journalistic privilege   | 0.60         | 360.00        |
| 06/23/22    | Research regarding journalistic privilege   | 1.50         | 900.00        |
| 06/27/22    | Attention to objections and other issues  | 2.10         | 1,995.00      |
| 06/28/22    | Research regarding journalist's privilege   | 1.00         | 600.00        |
| 06/28/22    | Review materials.   | 2.80         | 2,520.00      |
| 06/28/22    | Attention to objections and other issues; review legal research re reporter's privilege | 3.30         | 3,135.00      |
| 06/30/22    | Research regarding journalist's privilege   | 1.00         | 600.00        |

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Page 3

Client: United States District Court, Southern District of New York (Veritas)

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| <u>Date</u>       | <u>Description</u>                      | <u>Hours</u> | <u>Amount</u>       |
|-------------------|---|--------------|---------------------|
| 06/30/22          | Discuss review with Rita M.             | 0.30         | 285.00              |
| 06/30/22          | Discussion with Judge Jones re: status. | 0.50         | 450.00              |
| 06/30/22          | Attention to review and objections      | 2.00         | 1,900.00            |
| <b>Total Fees</b> |   |              | <b>\$ 59,915.00</b> |

## Expense Detail

| <u>Date</u>           | <u>Cost</u>         | <u>Description</u>  | <u>Amount</u>      |
|-----------------------|---------------------|---|--------------------|
| 06/30/22              | Document Production | Complete Discovery Source - Vendor: Complete Discovery Source - CDS, EDD technical Time, Monthly DAta Hosting, Monthly User License, Native Data Processing, Project Management Inv# INV-CDS-23283 Date: 06/30/2022 | 9,321.09           |
| <b>Total Expenses</b> |                     |   | <b>\$ 9,321.09</b> |

**Total Fees, Expenses and Charges on This Invoice****\$ 69,236.09**Government's 50% share:  
\$34,618.05

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Petitioners' 50% share:  
\$34,618.05  
SEATTLE WASHINGTON, DC

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